

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	Case No. 1:24-cr-83-TBM-BWR
	§	
TYLER SURLA	§	

**UNOPPOSED MOTION TO CONTINUE TRIAL
AND RESET PRETRIAL DEADLINES**

COMES NOW TYLER SURLA, DEFENDANT, and files this Motion to Continue Trial and Reset Pretrial Deadlines, for cause showing the Honorable Court as follows:

1. Posture of the case.

Defendant was arraigned on the Superseding Indictment on September 4, 2024. Defendant has requested no prior continuances.

2. Reason for this request.

Defendant is charged with serious offenses involving complex forensic data. Undersigned entered this case and began representing Defendant on September 3, 2024. The Government provided initial discovery to undersigned counsel the same day. Defendant respectfully requests a continuance to allow time to review discovery, prepare for trial, and engage in settlement discussions with the Government.

3. A continuance would serve the ends of justice.

The Defense consents and agrees that the requested delay shall be deemed “excludable delay” under the Speedy Trial Act, 18 U.S.C. §3161(A)(7)(i) and (iv) because, *inter alia*, proceeding to trial on the current trial schedule would deny counsel reasonable time necessary for effective preparation. The Defense furthermore consents and agrees that the ends of justice served by a continuance in this case would outweigh the best interest of the public and Defendant in a speedy trial.

4. Relief requested.

Defendant respectfully requests that the Honorable Court continue trial and reset all pretrial deadlines.

Respectfully submitted,

LAW OFFICES OF SEAN BUCKLEY, PLLC

/s/ Sean Buckley
Sean Buckley
MS Bar #106541
Mississippi Bar No. 106541
912 Convent Ave. Ste. 18
Pascagoula, Mississippi 39567
TEL: (228) 933-4411
Sean@SeanBuckleyLaw.com

CERTIFICATE OF CONFERENCE

I certify that on September 5, 2024 I discussed this Motion with AUSA Lee Smith, who stated that the Government is UNOPPOSED.

/s/ Sean Buckley
Sean Buckley

CERTIFICATE OF SERVICE

I certify that I provided a copy of this Unopposed Motion to Continue Trial and Reset Pretrial Deadlines to AUSA Lee Smith and all parties via the ECF system on this the 8th day of September 2024.

/s/ Sean Buckley
Sean Buckley